

Public Policy and External Affairs



1301 Gervais Street, Suite 825  
Columbia, SC 29201

Phone 803 254-5736  
Fax 803 254-9626

January 19, 2006

**VIA HAND DELIVERY**

The Honorable Charles L.A. Terreni  
Chief Clerk and Administrator  
Public Service Commission of South Carolina  
P.O. Drawer 11649  
Columbia, South Carolina 29211

1/20/06  
tod

Re: Application of Palmetto Utility Protection Service, Incorporated for Assignment of the 811  
Abbreviated Dialing Code Be Implemented in South Carolina  
**DOCKET 2005-390-C**

Dear Mr. Terreni:

Enclosed for filing are an original and ten (10) copies of Verizon Communications, Inc.'s **Petition to Intervene** in the above referenced docket.

By copy of this letter, I am serving all parties of record with a copy of the Petition to Intervene as indicated on the attached Certificate of Service.

If you have questions or need additional information, please do not hesitate to contact me at 803-254-5736.

With kind personal regards, I am

Amber L. Landsman

RECEIVED

JAN 19 2006

PSO SC  
DOCKETING DEPT.

Enclosure

cc: All Parties of Record (U.S. Mail)

RETURN DATE: 1/23/06 ok  
CLERK: Served John M.S. Hoefler 1/20/06  
tod

BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA

IN RE:

**DOCKET 2005-390-C**

APPLICATION OF PALMETTO  
UTILITY PROTECTION SERVICE  
INC. FOR ASSIGNMENT OF THE 811  
ABBREVIATED DIALING CODE TO  
BE IMPLEMENTED IN SOUTH  
CAROLINA

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**PETITION TO INTERVENE  
OF VERIZON SOUTH, INC.**

COMES NOW, Verizon South Inc. (hereinafter, "Verizon"), by and through counsel, hereby petitions the South Carolina Public Service Commission ("Commission") pursuant to South Carolina Code of Regulations R 103-836A(3) and other applicable rules and regulations of the Commission, for permission to intervene in the above-captioned proceeding, and in support of its petition, Verizon herein states as follows:

1. Verizon is a corporation and entity existing under the laws of the State of Virginia and has been certified by the Commission to provide, and is currently providing, local exchange, coin, access and intraLATA toll telecommunications services in South Carolina, which are services subject to the jurisdiction of the Commission.

2. For purposes of this proceeding, Verizon's authorized and legal representatives in this matter, **to whom all correspondence or communications should be addressed, are:**

Mr. Stan Bugner, State Director  
VERIZON COMMUNICATIONS INC.  
1301 Gervais St. – Suite 825  
Columbia, S. C. 29201  
803-254-5736  
803-254-9626 facsimile  
stan.bugner@verizon.com

Steven W. Hamm, Esquire  
C. Jo Anne Wessinger Hill, Esquire  
RICHARDSON, PLOWDEN, CARPENTER &  
ROBINSON, P.A.  
1600 Marion Street  
P.O. Box 7788  
Columbia, South Carolina 29202  
803-771-4400  
803-771-0016 facsimile  
shamm@rpclaw.com  
jwessingerhill@rpclaw.com

3. On or about December 14, 2005, the Commission established this proceeding via an issued Notice of Proceeding upon the Application of Palmetto Utility Protection Services, Inc. (hereinafter, “PUPS”) requesting the Commission to establish a generic docket that implements the 811 abbreviated dialing code in South Carolina for all telecommunications providers in compliance with the Federal Communications Commission (hereinafter, “FCC”) ruling.

4. Because Verizon is a telecommunications provider in South Carolina, any decision of the Commission in this docket will have a direct impact on Verizon. Verizon has a direct and substantial interest in this docket and respectfully requests permission to intervene in this matter as a full party of record.

5. It is the position of Verizon to assist the Commission in the development of a full and fair record to address the issues raised and determined in this proceeding. The position of Verizon, including good cause for the filing of this Petition in this matter, will be more fully detailed at the hearing and/or after completion of any discovery.

7. Verizon is informed and believes that its request to be made a party of record in this docket is in the interest of the public, is consistent with the policies of

the Commission for public participation in the matters before it, and is necessary for the development of a full and complete record to address the concerns and views of Verizon.

Accordingly, Verizon respectfully requests that the honorable South Carolina Public Service Commission (1) find that good cause exists for the filing of this Petition; (2) grant its request and issue an order in this docket permitting Verizon to participate in this proceeding as a full party of record with all attendant rights thereto; (3) allow Verizon to participate fully in the this proceeding and to take such positions as it deems advisable; and (4) grant any other and further relief as is just and proper.

Respectfully submitted this 19<sup>th</sup> day of January 2006.

BY: 

VERIZON SOUTH INC.

Ms. Leigh A. Hyer  
Vice President & General Counsel - SE Region  
Verizon Legal Department  
One Tampa City Center  
201 N. Franklin Street  
FLTC0007  
Tampa, Florida 33601  
813-483-1256  
Leigh.A.Hyer@verizon.com

Steven W. Hamm  
C. Jo Anne Wessinger Hill  
Richardson, Plowden, Carpenter &  
Robinson, P.A.  
1600 Marion Street  
P.O. Box 7788  
Columbia, South Carolina 29202  
803-771-4400  
shamm@rpclaw.com  
jwessingerhill@rpclaw.com

Its Attorneys

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**

**DOCKET NO. 2005-390-C**

IN RE:

Application of Palmetto Utility Protection )  
Service, Incorporated for Assignment of the )  
811 Abbreviated Dialing Code to be )  
Implemented in South Carolina )

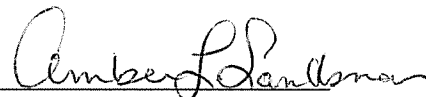
**CERTIFICATE OF SERVICE**

This is to certify that, Amber L. Landsman, an employee with Verizon Communications, Inc., have this date served one (1) copy of the **Petition to Intervene** in the above-referenced matter to the person(s) named below by causing said copy to be deposited in the United States Postal Service, first class postage prepaid and affixed thereto, and addressed as shown below:

Mr. Frank R. Ellerbe, III, Esquire  
Ms. Bonnie D. Shealy, Esquire  
Robinson, McFadden & Moore, P.C.  
1901 Main Street, Suite 1200  
Columbia, South Carolina 29202  
(Attorneys for Palmetto Utility Protection  
Services Inc.)

Ms. Nanette S. Edwards, Esquire  
Office of Regulatory Staff  
1441 Main Street, Suite 300  
Columbia, South Carolina 29201

Dated this 19<sup>th</sup> day of January, 2006.

By:   
Amber L. Landsman  
Verizon Communications, Inc.  
1301 Gervais Street, Suite 825  
Columbia, South Carolina 29201